

UNITED STATES DISTRICT COURT
for the
District of Oregon

United States of America)
v.)
) Case No. 3:21-mj-00200
JENIFER BELTRAN ARRENDONDO,)
)
)
)

Defendant(s)

**CRIMINAL COMPLAINT
BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 14, 2021 in the county of Marion in the
District of Oregon, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841(a)(1) Possession with intent to distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(vi)

This criminal complaint is based on these facts:

See the attached affidavit of DEA Special Agent Devin Sperling

Continued on the attached sheet.

/s/ Signed by telephone
Complainant's signature

DEVIN SPERLING, DEA Special Agent
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 10:39 AM/p.m. 

Date: 10/14/2021



Youssef Jim You

Judge's signature

City and state: **Portland, Oregon** HON. YOULEE YIM YOU, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss:

AFFIDAVIT OF DEVIN SPERLING

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Devin Sperling, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Drug Enforcement Administration (DEA) and have been since October 26, 2018. My current assignment is Task Force Group D-51, of the Portland District Office. As such, I am an “investigative or law enforcement officer” within the meaning of Section 2510(7) of Title 18, United States Code; that is, an officer of the United States empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. My training and experience includes 16 weeks at the Drug Enforcement Administration Academy at Quantico, Virginia. At the academy, I was trained in all aspects of conducting narcotics investigations to include debriefing defendants, witnesses, and informants, conducting surveillance, executing search warrants, conducting controlled deliveries, utilizing law enforcement, open source, and social media databases, and seizing narcotics and narcotics-related assets. I have also acquired knowledge and information about illegal drug trade and the various means and methods by which it is furthered from formal and informal training, other law enforcement investigators, informants, individuals I have interviewed, and from my participation in investigations. I have also worked with and consulted numerous agents and law enforcement officers who have investigated drug trafficking offenses.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for:

- Jennifer Beltran Arredondo

for violations of Title 21, United States Code, Section 841(a)(1), Possession with Intent to Distribute Controlled Substances (the “Target Offenses”).

Applicable Law

3. Title 21, United States Code, Section 841(a)(1) makes it illegal to possess controlled substances – including counterfeit oxycodone pills containing fentanyl – with the intent to distribute them.

Confidential Sources

4. [REDACTED]

Statement of Probable Cause

5. [REDACTED] informed investigators that a Hispanic female would be arriving the evening of October 14, 2021 to receive a shipment of narcotics and would be carrying US currency in order to pay the transaction. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

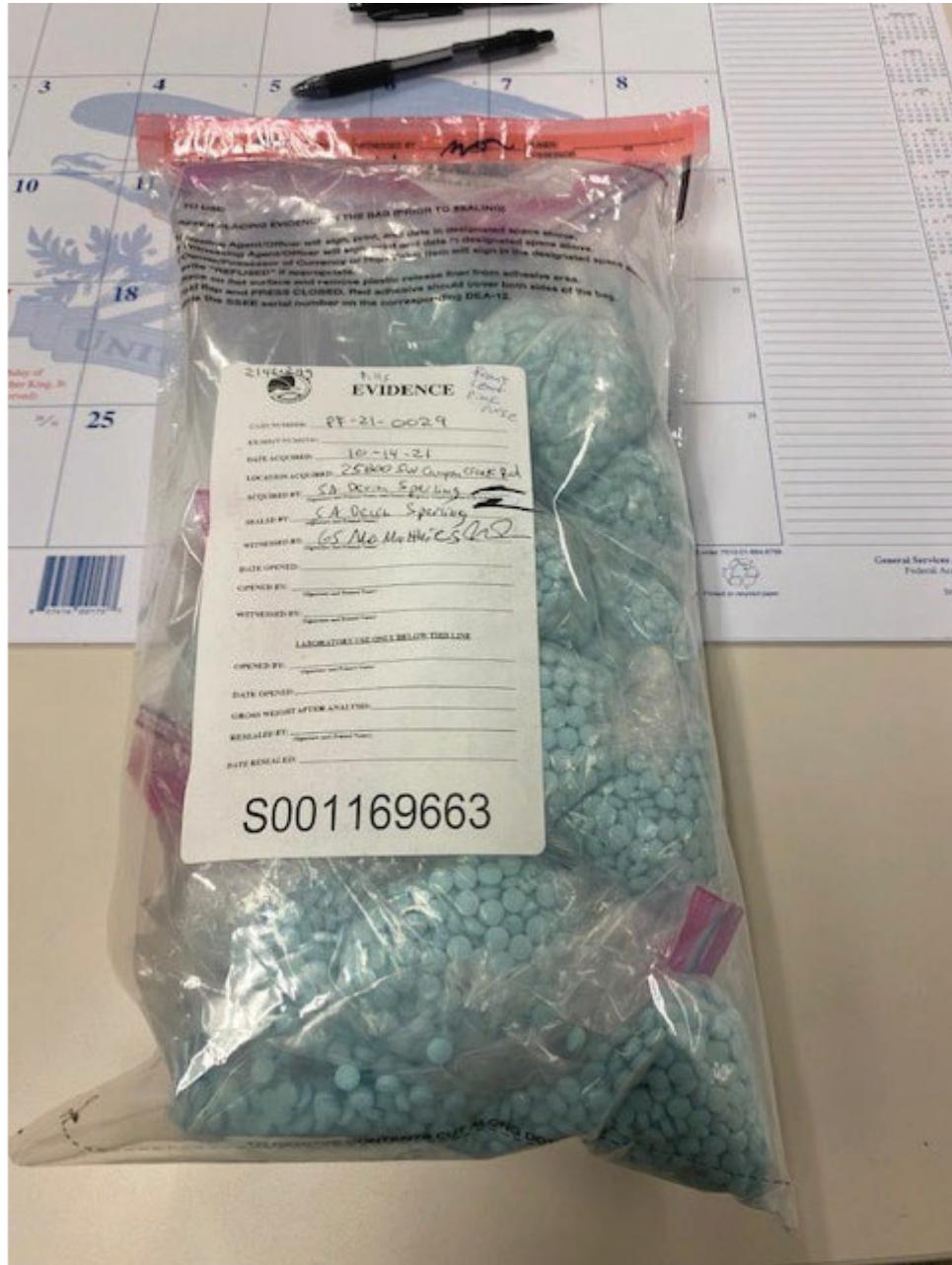
[REDACTED]

6. On October 14, 2021 investigators from DEA Portland OR District Office Group D-51 established surveillance in the vicinity of 25800 SW Canyon Creek Rd. At approximately 5:42 p.m. Investigators observed a Red/Orange Ford Focus with Oregon license plate 223LTC driven by a dark haired Hispanic female enter the parking lot and park directly next to a white Acura sedan. Investigators activated visible police lighting and drove in behind both vehicles. Investigators approached the Focus wearing visible “Police” placards on vests, and verbally identified themselves as Police. Investigators issued verbal commands to the driver of the Focus to exit the vehicle. The driver ignored investigators commands, locked the vehicle doors and appeared to be communicating on a cell phone. Investigators repeated commands to unlock the door multiple times. After multiple commands the driver unlocked the door, and was removed from the vehicle by investigators.

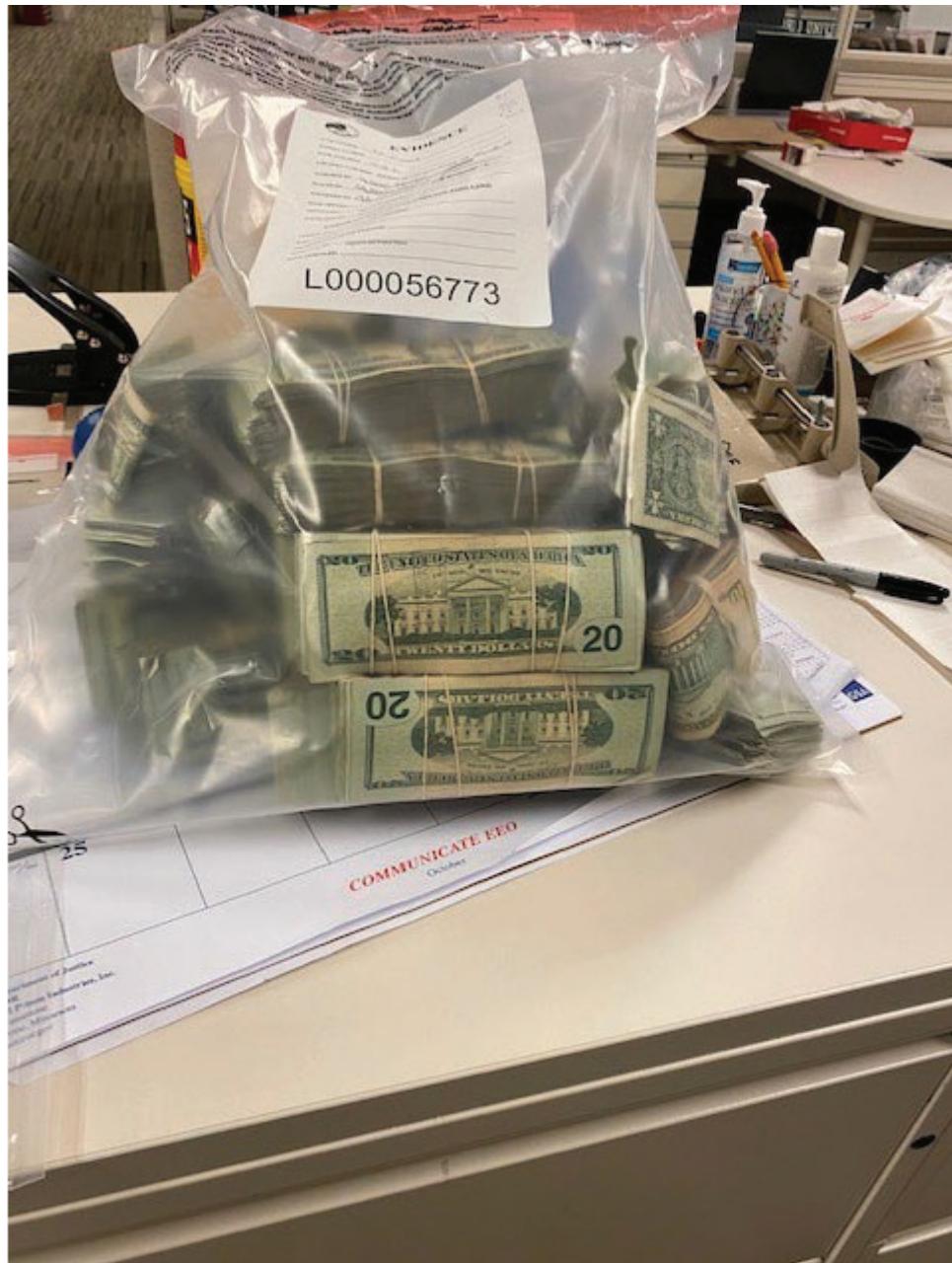
7. Investigators identified the driver of the focus from a Washington State driver’s license as Jenifer Beltran Arredondo (hereinafter “Beltran”). Investigators read Beltran her Miranda rights in English and she indicated she understood them. Beltran declined to speak to investigators further on scene.

8. Investigators conducted a search of the Focus and located a pink purse on the front passenger seat. Inside the purse investigators located multiple plastic bags containing blue pills marked “M/30” suspected to be counterfeit oxycodone containing Fentanyl. On the back seat of the Focus investigators located a cardboard box with a cloth bag inside. Inside the cloth

bag investigators located bulk US currency separated into rubber band wrapped stacks. Based on my training and experience I know that narcotics traffickers often bundle US currency into separate rubber band wrapped stacks in order to keep track of specific amounts of cash for transactions.



Suspected Counterfeit Oxycoode seized from the front seat of Beltan's Focus
Page 4 – Affidavit of Devin Sperling **USAO Version Rev. April 2018**



Bulk US currency seized from the back seat of Beltran's Focus

9. Investigators transported Beltran to the DEA Portland District Office, where she agreed to speak with them. Beltran stated she had been asked by an individual named "Alan Munoz" she met at a "Mexican store near the Wells Fargo in Tualatin" to meet the driver of the Acura and exchange the US currency and counterfeit oxycodone pills for narcotics Beltran

stated this was the first time she had made a narcotics transaction. Beltran stated she placed the pills in the pink bag in order to conceal them. Investigators asked Beltran if she had texts between her and Alan Munoz and she stated that she had erased them.

10. Investigators transported all evidence seized from the Acura to the DEA Portland OR District Office where they were weighed and tested. Investigators found the suspected counterfeit oxycodone pills weighed 2146.2 gross grams including packaging. Investigators did not test the suspected fentanyl pills due to DEA policy, however based on my training and experience and previous investigations I have found that blue pills marked "M/30" have tested positive for fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, a Schedule II controlled substance) at the DEA Western Laboratory in every previous instance. I have found that multiple unconnected Mexican DTOs all were involved in distributing identical pills, which tested positive for fentanyl in all cases I have been involved with. I noted the pills were not packaged in any form of prescription packaging, and appeared packaged separately in large even quantities for distribution. I noted the pills did not appear to have an even coloring, indicating to me they were not manufactured by a legitimate pharmaceutical company. Based on my training, experience, observations, and the facts of this investigation, I believe the pill packaging, bulk quantity and method of transport were all consistent with Mexican DTO produced counterfeit narcotics containing fentanyl and not pharmaceutical grade prescription medication.

Conclusion

11. Based on the foregoing, my training, experience, and the case to date, I believe Beltran possessed with the intent to distribute 2146.2 gross grams of counterfeit oxycodone pills

suspected to contain fentanyl, in violation of the Target Offense. I therefore request the Court issue a criminal complaint and arrest warrant for Beltran for these violations.

12. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Paul Maloney, and AUSA Maloney advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

13. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time is likely to seriously jeopardize the ongoing investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

/s/ Sworn to by telephone
In accordance with Fed. R. Crim. P. 4.1
Devin Sperling
DEA Special Agent

Sworn to by telephone at 10:39 ~~xx~~/p.m. this 14th day of October 2021 in accordance with Fed. R. Crim. P. 4.1.

Youlee Yim You
HONORABLE YOULEE YIM YOU
United States Magistrate Judge